

Regarding "automatically identify the location" of all VoIP callers with handsets that connect to the telephone network, I believe this is not only impractical, but also a serious privacy concern. From a practicality perspective, mapping every wifi access point for triangulation is simply implausible.

They are portable, are not always "up" and may rogue AP. The idea of mandating VoIP phones to have GPS is absurd, considering an average laptop can serve the purpose of a VoIP phone. Finally, all these points aside, forcing current providers to support this service may be possible, however VoIP is public domain. While Skype is a for-profit organization, a viable, community developed and run open source alternative is likely. Who in that case would be responsible for implementing this service?

Regarding privacy: who will have access to the location data stored by VoIP handsets? Can the FCC or carriers guarantee these handsets won't be hacked for malicious purposes? What rules will govern police monitoring of your moment-to-moment location? Should the federal government really be in the business of compiling a database of every wireless or wired access point in the country? And once such a database is created, what's to stop the government from saying that computer users also must have their locations registered? What if someone doesn't want this service?

In conclusion, please reconsidering proceeding 05-196. It's not practical and it endangers the small amount of privacy we have left in this post 9/11 world.